

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CR 18-2945 WJ

SUBHANAH WAHHAJ,

Defendant.

UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE REPLY

Defendant Subhanah Wahhaj, by and through undersigned counsel Ryan J. Villa and Justine Fox-Young, moves the Court to extend the deadline within which to file her Reply to the Government's Response to the Motion to Dismiss Count Five for a period of two (2) weeks, and as grounds therefore states:

1. On December 19, 2022, Defendants filed their Motion to Dismiss Count Five. *See* Motion [Doc. 555].
2. On January 17, 2023, the Government filed its Response to Defendants' Motion. *See* Response [Doc. 579].
3. The deadline for Defendants' Reply to the Government's Response is January 31, 2023.
4. Counsel for Defendant needs additional time to complete the Reply.
5. Accordingly, counsel requests the Court extend the deadline by two (2) weeks to February 14, 2023.
6. The undersigned counsel has contacted counsel for the United States, AUSA Kimberly Brawley, regarding this Motion. Ms. Brawley has indicated that the United States does not oppose this Motion.

WHEREFORE, Counsel for Defendants respectfully request this Court enter an Order extending the time to file their reply to February 14, 2023.

Respectfully submitted,

/s/ Ryan J. Villa

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CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2023, I filed the foregoing electronically through the CM/ECF system, which caused counsel for the United States to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa

RYAN J. VILLA